

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

- (1) LESLIE BRIGGS, as next friend
of T.W. and B.S.;
- (2) EVAN WATSON, as next friend
of C.R.;
- and
- (3) HENRY A. MEYER, III, as next
friend of A.M., for themselves and
for others similarly situated,

Plaintiffs,

v.

Case No. 12-cv-00081-GKF-JFJ

- (1) CARRIE SLATTON-HODGES,
in her official capacity as the
Commissioner of the Oklahoma
Department of Mental Health and
Substance Abuse Services; and
- (2) CRYSTAL HERNANDEZ, in her
Official capacity as Executive
Director of the Oklahoma Forensic
Center,

Defendants.

**DEFENDANTS' UNOPPOSED MOTION FOR
STIPULATED PROTECTIVE ORDER WITH BRIEF IN SUPPORT**

For their Unopposed Motion for Stipulated Protective Order, Defendants Carrie Slatton-Hodges and Crystal Hernandez, in their official capacities, state the following:

1. Certain documents and information have been and may be sought, produced, or exhibited by and between the parties in this proceeding (the "Proceeding").
2. Some of these documents relate to the parties' and non-parties' medical, psychiatric, and other types of protected health information and other sensitive information which the party making the production deems confidential.

3. It has been agreed by the parties to the Proceeding, through their respective counsel, that to expedite the flow of discovery material and to preserve the confidentiality of certain documents and information, a protective order should be entered by the Court.

4. Based on the foregoing, Defendants move for entry of the stipulated protective order attached hereto as Exhibit 1. Plaintiffs' counsel has reviewed the proposed stipulated protective order and does not object to its entry.

5. Trial courts have inherent power and broad discretion to enter protective orders such as the one requested here. *See Burke v. Glanz*, No. 11-CV-720-JED-PJC, 2013 WL 211096, at *2 (N.D. Okla. Jan. 18, 2013).

Relief Requested: Defendants request that this Court enter the Stipulated Protective Order attached hereto as Exhibit 1. A copy of the proposed Stipulated Protective Order will be submitted to the Court via the procedure outlined in the Administrative Guide for submitting proposed documents electronically.

Respectfully submitted,

/s/ Devan A. Pederson
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*Attorneys for Defendants Carrie Slatton-Hodges
and Crystal Hernandez*

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of April 2023, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to counsel of record who are ECF registrants.

s/ Devan A. Pederson
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